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February 8, 2000

OUR FILE NO.
1760-101-63

Magalie R. Salas, Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TW-A325
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

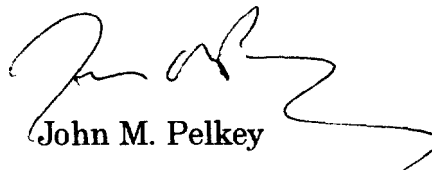
RE: Amendment of Section 73.202(b)
Table of FM Allotments
Elberton and Lavonia, GA
Docket No. 99-343
RM-9750

Dear Ms. Salas:

Transmitted herewith are an original and four copies of the **REPLY COMMENTS OF RADIO ELBERTON, INC.**, in the above-referenced proceeding.

If you have any questions concerning this submission, please contact the undersigned directly.

Sincerely,


John M. Pelkey

Enclosures (5)
JMP/blr

074

Before The
Federal Communications Commission

Washington, D.C. 20554

In The Matter Of)	
)	
Amendment of Section 73.202(b))	MM Docket No. 99-343
Table of Allotments)	
FM Broadcast Stations)	
Elberton and Lavonia, GA)	
)	
In re Application of)	
)	
Waves of Mercy Productions, Inc.)	BPED-19990630MB
Pendergrass, Georgia)	
)	
For Construction Permit for New)	
Noncommercial Educational FM)	
Station)	

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To: Chief, Allocations Branch

Reply Comments of Radio Elberton, Inc.

Radio Elberton, Inc., through counsel, hereby files its Reply Comments in the above-captioned proceeding.

By Notice of Proposed Rulemaking ("*NPRM*") released December 3, 1999, in the above-referenced proceeding, the Commission established January 24, 2000, as the date for the submission of Comments and February 8, 2000, as the date for the submission of Reply Comments.

The *NPRM* noted that Radio Elberton's proposal to reallocate Channel 221A from Elberton, Georgia, to Lavonia, Georgia, conflicts with an application filed by Waves of Mercy Productions, Inc. ("*Waves of Mercy*"), for a non-commercial station to operate on Channel 220A at Pendergrass, Georgia

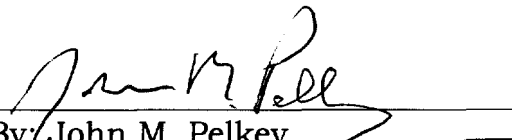
(BPED-19990630MB). The *NPRM* requested that commenting parties compare the Radio Elberton proposal with the Waves of Mercy proposal on the basis of the allotment priorities set forth in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982). *NPRM* at ¶4.

Although Radio Elberton filed Comments wherein it clearly demonstrated that the Radio Elberton proposal better serves the Commission's allotment priorities than the Waves of Mercy application, neither Waves of Mercy nor any other party filed any comments providing any analysis comparing the Radio Elberton proposal with the Waves of Mercy application. In addition, a review of the most recent database information available to Radio Elberton's engineer reveals that no other non-commercial applications have been filed that would conflict with the Radio Elberton proposal.

As a result, for the reasons set forth in Radio Elberton's Comments, the Radio Elberton proposal should be adopted.

Respectfully submitted,

RADIO ELBERTON, INC.


By: John M. Pelkey

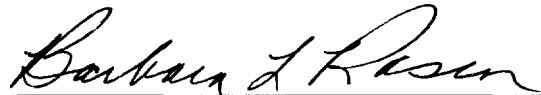
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February 8, 2000

CERTIFICATE OF SERVICE

The undersigned, an employee of Haley, Bader & Potts, hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered*, to the following:

*Leslie K. Shapiro, Esq.
Mass Media Bureau
Federal Communications Commission
445 Twelfth Street, SW, Room 3-A360
Washington, DC 20554

Waves of Mercy Productions, Inc.
5319 Amherst Way
Flowery Branch, GA 30542
(Applicant for Pendergrass, GA)

A handwritten signature in cursive script, reading "Barbara L. Rascon", written in black ink.

Barbara L. Rascon

February 8, 2000

*Hand Delivery